

### REMARKS

Claims 10 through 15 are in this application and are presented for consideration. By this amendment, Applicant has presented new independent claim 10 with dependent claims 11 and 12 and new independent claim 13 with dependent claims 14 and 15. Claim 10 is similar to the subject matter of claims 1, 2 and 5 of the originally presented claims.

Claim 13 is similar but somewhat more particular to the actuator with chain and sprocket drive of the invention.

The disclosure has been objected to based on the position that the features mentioned are not shown in Figure 3. Applicant notes that the features are shown in Figure 3 but the perspective view provides some distortion or inability to thoroughly perceive or see these features. However, Applicant has amended the text to reference Figure 6 wherein these features are clearly shown. Specifically, the protrusions 27 and 28 that form a tapered passage 29 on the level of the rollers of the chain can be seen more clearly.

The drawings have been objected to for not showing all features claimed. Applicant has presented the new claims making it clear that the structure includes a connection for a door and that the door is not claimed as part of the combination. Accordingly, it is believed that there is no need for a showing of the door.

Claims 6 and 7 have been rejected as being non-enabled by the original disclosure. It is Applicant's position that the protrusions 27 and 28 and the tapered passage 29 is at least shown in Figure 7 and the figures in combination with the disclosure provide information for the person of ordinary skill in the art to make and use the invention. Accordingly,

reconsideration of the rejection of claims 3 and 9 is requested.

Original claims 1, 2, 4 and 8 have been rejected as being anticipated by Wheatland. Further, claims 3 and 9 have been rejected as being obvious based on Wheatland. As these claims are not presented, it is believed that these rejections are no longer applicable.

Claims 1 through 7 have been rejected as being obvious based on the teachings of Meyer et al., in view of Wheatland. Applicant respectfully requests that the Examiner reconsider the rejections in view of the new claims and in view of the following discussion.

Although there may be some analogous action between the tape structure with sprocket of Meyer and the chain and sprocket structure of the invention, there are important differences, including the fact that the chain includes linkages pivoting about roller elements with this interaction being known to have particular problems such as the chain jumping the sprocket, the chain being kinked or non-pivoting as well as problems with regard to the difference between the chain portion under tension on the active part of the chain and the chain not under tension in the passive part of the chain. The invention provides both an internal side chain guide as well as an external chain guide which cooperate to form several tracts dimension to provide a guide passage having a width compatible to the dimensions of the link. This assist in guiding the link as the rollers are engaged by the sprocket. The various tracts include direct to linear tract extending tangentially from the sprocket (formed by the portion of both the inner fixture and outer fixture) as well as the intermediate circular tract part concentric to the sprocket which is again formed by portions of the inner and outer fixture wherein this is followed by the curvilinear tract which guides the chain in the direction toward the rectal linear

tract. This curvilinear tract is again formed by portions of the inner fixture and outer fixture which this leading to a parallel tract section (the linear part of the curvilinear tract) which is again formed by portions of the inner fixture and outer fixture. These features are particular to a chain structure and these features are not provided or suggested in combination by the teachings of Meyer et al. Further, Meyer provides a general guiding in a tangential section leading to the sprocket and in an angled section leading to the sprocket but this does not provide a suggestion with regard to guiding chains, particularly no suggestion with regard to the difficult transition zone between the free running chain and the engaged chain.

Meyer further clearly fails to suggest the roller protrusions which are provided in the rectal linear and curvilinear tracts according to the invention (see for example claims 11 and 14). Of course Meyer would have no use for this in that Meyer uses a tape drive, which does necessarily have different considerations as compared to a chain link drive. Accordingly, the prior art as a whole fails to suggest the combination of features as specified in the claims. Accordingly, Applicant respectfully requests that the Examiner favorably consider the claims as now presented.

Respectfully submitted  
for Applicant,

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